

LARocca HORNik ROSEN
& GREENBERG LLP
COUNSELORS AT LAW

THE TRUMP BUILDING
40 WALL STREET
32ND FLOOR
NEW YORK, NY 10005
212.530.4823
212.530.4815 FAX
LHRGB.COM

PRIVATE LENDER GROUP
PROFESSIONAL ARTS CENTER
475 COUNTY RD 520
SUITE 200
MARLBORO, NJ 07746
212.536.3529
732.625.2463 FAX

DIRECT DIAL: 212.488.1580
E-MAIL: JGARCIA@LHRGB.COM

FRANK J. LARocca ⁴⁰
JONATHAN L. HORNik
LAWRENCE S. ROSEN
ROSE GREENBERG ^Δ
AMY D. CARLIN ^Δ
PATRICK MCPARTLAND ^Δ
DAVID N. KITTREDGE
JARED E. BLUMETTI
SANFORD HAUSLER ^Δ
JOHN L. GARCIA
LAUREN CASPARIE ^Δ
JESSICA THUAL ^Δ
PETER KELEGIAN ^Δ
DREW TANNER [‡]
LAUREN WEISSMAN-FALK
NELSON DIAZ
RYAN DUFFY
DANIEL KRAFT [‡]
CHRISTOPHER FORD [‡]
^Δ NEW YORK BAR ONLY
[‡] NEW JERSEY BAR ONLY
[◊] OF COUNSEL ATTORNEYS
[◊] CERTIFIED MATRIMONIAL LAW ATTORNEY

January 25, 2024

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: Garrison Redd v. 817 Lexington Ave I LLC, et al.
Case No. 23-cv-2552 (JMF) (BCM)

Dear Judge Furman:

We represent all defendants in this action and are writing jointly with plaintiff's counsel, in accordance with Section 2(E) of Your Honor's rules, to respectfully request that the: (i) discovery deadline be extended from January 26, 2024 to February 26, 2024, and (ii) pretrial conference be adjourned from January 30, 2024 to a date that is convenient to the Court.

The reason for the request is that the parties are engaged in continuing settlement efforts under the guidance of Magistrate Judge Moses. Specifically, the parties attended a productive settlement conference before Judge Moses earlier this week on January 23rd. Following the conference, Judge Moses set a protocol with firm deadlines for the parties to follow to continue their negotiations in advance of a further settlement conference scheduled for February 14th. See ECF Doc. No. 56.

The parties respectfully submit that the most efficient use of the Court and the parties' time and resources remains focusing on resolving this matter through settlement negotiations. However, without an extension of time to complete discovery, the parties will be constrained to also spend time and resources on complying with the dispositive motion and pretrial deadlines set forth in Your Honor's rules.

As such, the parties respectfully request this brief extension of the discovery deadline and the pretrial conference. This is the parties' second request to extend the discovery deadline. On December 7, 2023, the Court partially granted the parties' first request by extending the discovery deadline to the current deadline of January 26th. *See* ECF Doc. No. 49.

Respectfully submitted,

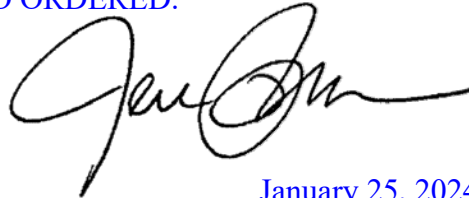
/s/ *John L. Garcia*

John L. Garcia
Patrick McPartland

cc: All counsel of record (*via ECF*)

Application GRANTED. In light of this extension and the parties' representations in their joint letter, ECF No. 57, the pretrial conference scheduled for January 30, 2024, is hereby ADJOURNED to **February 27, 2024**, at **9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 58.

SO ORDERED.

A handwritten signature in black ink, appearing to be 'Jan [unclear]', is written over the typed name 'Jan [unclear]'. The signature is fluid and cursive.

January 25, 2024